REMARKS

In the final Office Action dated August 1, 2005, then-pending claims 1-4 were rejected.

Claims 1-4 are rejected under 35 U.S.C. 103(a) as being unpatentable over PowerPoint (hereinafter PowerPoint, published in 1999 by Microsoft Corporation) in view of Computer Talk (Computer Talk: A Partial Glossary Of Contemporary Computer Terminology, published in 1998).

Claims 1and 3 are amended. Claims 2 and 4 are cancelled

This response seeks to convince the Examiner to remove the final rejection, or failing that to place claims 1 and 3 in better form for appeal by narrowing the issue for appeal in regard to the rejection.

The foregoing amendments and the following remarks are believed to be fully responsive to the final Office Action, and are believed to place the application in condition for allowance.

The proposed amendment to claims 1 and 3 should be entered.

Claim 1 as proposed to be amended is as follows:

A website for displaying a plurality of HTML pages sequentially, the website comprising:

(a) a second HTML page of the website having a second-image link;

(b) a first HTML page of the website having a first-image link which links the first HTML page to the second HTML page of the website so that the first HTML page is displayed sequentially first and the second HTML page is displayed sequentially second when the first link is activated; and

(c) a third HTML page of the website, which is to be inserted on the website in a predetermined position of either between the first and second HTML pages of the website, before the first HTML page of the website, or after the second HTML page of the website for forming a user-predetermined sequence order, and having a third-image link which either links the third HTML page to both the first and second HTML pages, to the second HTML page, or to the first HTML page;

wherein a webpage authoring tool of the website automatically modifies either both the first link and second link of the first and second HTML pages of the

website upon insertion of the third HTML page of the website in the
predetermined position, or adds an additional link in either the first or second
HTML page upon insertion of the third HTML page in the predetermined
position, so that the first, second and third HTML pages of the website are
displayed sequentially in the user-predetermined sequence order.

The proposed amendment to claims 1 and 3 is substantially similar and is intended to convince the Examiner to remove the final rejection, or failing that to place the claims in better form for appeal by narrowing and clarifying the issue for appeal in regard to the rejection.

The Examiner's combining of PowerPoint with Computer Talk in an attempt to arrive at the claimed invention in claims 1 and 3 is believed to be in error.

Obviousness cannot be established by combining prior art references to produce the claimed invention, absent some motivation or suggestion supporting the combination. Moreover, the showing of combinality must be clear and particular. See Ruiz et al. v. A.B. Chance Co., 234 F.3d 654, 57 U.S.P.Q.2d (BNA) 1161 (Fed. Cir. 2000).

The Examiner acknowledges on page 4 of the final rejection that PowerPoint is not a software system in which the displayed pages are pages of a website as in the claimed invention. Moreover, he acknowledges that PowerPoint cannot be remotely controlled, i.e. it can only be controlled from within and not from without. In other words, if first and second pages in PowerPoint were to be exported to a website to be displayed as first page first and second page second on the website, the insertion of an additional page of the website, such as between the first and second pages, in order to display the three pages as first page first, additional page second, and second page third, is not possible. Instead, PowerPoint requires that this be done removed from the website, i.e. within PowerPoint, contrary to the claimed invention.

The Examiner then on page 4 of the rejection combines CGI with PowerPoint in an attempt to arrive at the claimed invention. In this connection, he concludes that CGI could be used to operate PowerPoint remotely – relying on page 5 of COMPUTER TALK, which states that CGI is "A standard way of extending Web server functionality by executing programs or scripts on a Web server in response to Web browser requests.". Also, it is noted that the cited

GLOSSARY describes CGI as "A standard for the exchange of information between a Web server and computer programs that are external to it." However, such an exchange is only available <u>when permitted by the computer program</u> – which is not the case in PowerPoint. Moreover, even if CGI could be used if permitted by PowerPoint, the insertion of the additional page would still have to be <u>within PowerPoint</u>, and not <u>at the website</u> as in the claimed invention.

Accordingly, if CGI could be used to operate PowerPoint, the insertion of the additional page would occur in a different way than in the claimed invention. That is to say, if CGI could be used to operate PowerPoint, there be no realization of the claimed invention. For example, there would be no realization of the claim features as follows:

(c) a third HTML page of the website, which is to be inserted on the website in a predetermined position of either between the first and second HTML pages of the website, before the first HTML page of the website, or after the second HTML page of the website for forming a user-predetermined sequence order, and having a third-image link which either links the third HTML page to both the first and second HTML pages, to the second HTML page, or to the first HTML page;

wherein a webpage authoring tool of the website automatically modifies either both the first link and second link of the first and second HTML pages of the website upon insertion of the third HTML page of the website in the predetermined position, or adds an additional link in either the first or second HTML page upon insertion of the third HTML page in the predetermined position, so that the first, second and third HTML pages of the website are displayed sequentially in the user-predetermined sequence order.

The Examiner has assumed that CGI will work with PowerPoint in an attempt to arrive at the claimed invention. This assumption is in error as indicated above. Thus, the motivation or suggestion to combine CGI with PowerPoint is lacking, and the showing of combinality is not clear and particular as required.

For the foregoing reasons, the rejection of claims 1 and 3 should be removed.

-6-

Should the Examiner consider that additional amendments are necessary to place the application in condition for allowance, the favor is requested of a telephone call to the undersigned counsel for the purpose of discussing such amendments.

For the reasons set forth above, it is believed that the application is in condition for allowance. Accordingly, reconsideration and favorable action are respectfully solicited.

Respectfully submitted,

Attorney for Applicant(s)
Registration No. 36,390

Peyton C. Watkins/lam
Rochester, NY 14650
Telephone: 585-477-8282
Facsimile: 585-477-4646
If the Examiner is unable to reach the Applicant(s) Attorney at the telephone number provided, the Examiner is requested to communicate with Eastman Kodak Company Patent Operations at (585) 477-4656.